

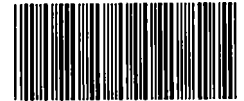


STATE OF DELAWARE
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(Red)



SEMS DocID 2332230

Mr. Stephen R. Wassersug, Director
Hazardous Waste Management Division
U.S. EPA Region III. (3HW00)
Walnut Street
Philadelphia, PA.

Dear Mr. Wassersug:

Pursuant to our recent discussions, I am writing to document this Department's positions and our understanding on the status of the Pigeon Point Landfill vis-a-vis the Superfund process. The Pigeon Point site was utilized for dredge spoil disposal by the Corps of Engineers up to 1968 and subsequently for solid waste disposal (mixed municipal and industrial wastes). Waste disposal at Pigeon Point occurred under the direction of the City of Wilmington (1968-1971), New Castle County (1971-1980), and the Delaware Solid Waste Authority (1981-1985). In 1985 the site was closed and is currently being maintained by DSWA under a post-closure monitoring program approved by DNREC.

The Pigeon Point Landfill was proposed for the National Priorities List (NPL) early this year. Pursuant to that proposal the Delaware Solid Waste Authority submitted comments pointing out that inaccurate data and inappropriate use of data was used to develop the Hazard Ranking Score of the site.

We agree with the DSWA's arguments that the data used to document a release of contaminants to ground water at Pigeon Point are either bad data (i.e., arsenic from late 1984-early 1985), data from wells inside the landfill waste material (and therefore not a release), or so close to detection limits that they shouldn't be considered a release. If these data problems were evaluated consistent with current HRS practice, the resultant site score would be below that considered for the NPL.

Mr.. Stephen Wassersug
August 20, 1987
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In addition to reviewing DSWA's articulate arguments, DNREC has performed an evaluation of available information on the geohydrology, ground water quality and water use in the vicinity of the Pigeon Point Landfill. We have found that ground water in the monitor wells in the unconfined and shallowest confined sands on the Pigeon Point site and in public and industrial wells drawing water from the confined Potomac aquifer offsite, are contaminated to a degree which makes it objectionable as a public water supply source. However, a recent study by the U.S. Geological Survey (now going to print) states that the reason for this degradation is infiltration of seasonally brackish water from the Delaware River and/or its adjacent marshes and tributaries in response to heavy pumpage from the Potomac aquifer.

DNREC believes that the Pigeon Point Landfill does not represent a significant threat to human health (via contamination of well water supplies) or to the environment. The dredge spoils and recent fluvial sediments beneath the landfill and the leachate collection and treatment system prevent any significant migration of contaminants from the site. DNREC will provide an expanded written report documenting this position to EPA in the future.

At this point we have agreed that re-sampling of selected wells at Pigeon Point will be done to generate a data base which can be used to more confidently develop a Hazard Ranking Score for the site. The Department will collect and analyze these samples. This data and DNREC's expanded report on Pigeon Point should be available in two months. This information will be used to rescore the site and - pending the anticipated reduction in the HRS - the Pigeon Point Landfill will not be added to the NPL.

Thank you for your cooperation in this matter. We look forward to working with EPA to resolve this issue.

Sincerely,


Phillip G. Retallick

PGR:dmt

cc: Governor Michael N. Castle
John E. Wilson, III.
N.C. Vassuki, DSWA
James Seif, Regional Administrator, Region III. EPA
J. Winston Porter, OSWER
Michael A. Apgar